



Linda Stevenson, CPA
Vice President-Finance & Administration

October 14, 2010

Chairman Ben S. Bernanke
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

RE: Docket No. R-1390
Federal Reserve Board's Proposed Changes to Credit Insurance Disclosures under Reg Z and
the Truth-in-Lending Act

Dear Chairman Bernanke:

I write in opposition to the Federal Reserve Board's proposed changes to Regulation Z relating to credit insurance and debt protection disclosures.

My employer is a low-income designated community credit union with 25,000 members, located 50 miles north of Austin, Texas. We are very concerned about the proposed regulatory change, which would most certainly mislead and potentially cause harm to our members.

Most of our members do not have sufficient life or disability insurance when they step foot into one of our branch locations to apply for a loan. We offer credit life insurance at a very reasonable cost, based on the loan amount and as regulated by the State of Texas. For many of our members, the credit life coverage represents a material portion of their total life insurance death benefit. As the balance of the loan decreases, so does the benefit, and so does the monthly premium.

The Federal Reserve Board proposes excessive interference with commerce, and the unintended consequences of the proposal may mean financial disaster or hardship for many of our borrowers-members. The Credit Union earns non-interest income from the sale of credit protection products, but not to the detriment of members.

Instead of objective disclosures designed to inform consumers of the cost of credit, the disclosures are biased, half-truths designed to steer consumers away from the product. We respectfully ask that you intercede on our behalf in this rulemaking so that the proposed disclosures are withdrawn. We ask that the current disclosures remain in effect unless and until they can be revised in an objective, unbiased manner that does not unreasonably interfere with commerce and the business of insurance.

Respectfully,

A handwritten signature in blue ink that reads "Linda N. Stevenson". The signature is fluid and cursive, with the first name "Linda" and last name "Stevenson" clearly legible.

Linda N. Stevenson, CPA
Vice President-Finance & Administration